

04/14/93

PIG'S EYE DUMP

US EPA RECORDS CENTER REGION 5



557278

- * Opened in 1956, sometime after June 14th.
- * Operated until July 1, 1972. MPCA would not allow a permit because site was in a flood plain.
- * Site consists of approximately 320 acres.
- * Site served more than 70% of St. Paul and southern suburbs.
- * Residential, industrial, and commercial wastes were brought to site.
- * Site is currently owned by St. Paul Port Authority, Metropolitan Waste Control Commission (MWCC), and CME Real Estate.
- * In December 1977, MWCC was permitted to dispose of sewage sludge ash on 31 acres of site. Permit was renewed in 1979 and 1985. Approximately 435,000 cubic yards of ash disposed at site.
- * MWCC possibly dumped sewage sludge on the site during the early 70's.
- * There were numerous fires at the dump during its years of operation. The site burned intermittently in Summer 1988 for two months.
- * Site was divided into three areas: North contained demolition wastes; Central was fenced in and contained 3M wastes; South contained household wastes and Ford Motor Company wastes.
- * There is currently a wood chipping facility on the site which is operated by the City of St. Paul.
- * In 1961, the St. Paul City Council closed dump to nonresidents unless arrangements were made with either council or private hauler. Haulers were asked to identify nonresidents stops.
- * In 1964, burning is stopped at the site.
- * In 1966, City of St. Paul is notified by the Minnesota Health Department on problems with the dump.
- * In 1967, City begins to charge fee for dump usage. MPCA notifies the City about problems with the site.
- * In 1965 and 1969, the whole site was under water as a result of flooding.
- * In 1971, 1,375 tons of waste dumped at the site per day. 25-30% demolition wastes and trees; 25% earth, concrete, and other noncombustibles; 10% cellulosic wastes like 3M; 2% City

garbage; and 30% street waste, ashes, tin cans, and furniture.

- * In 1957, 1200 truckloads daily of industrial and commercial wastes.

- * Site was for haulers and city predominately. Individuals went to Fish Hatchery dump which was located nearby.

- * MPCA has lists of haulers who were licensed during the site years of operation.

- * MPCA has list of former dump employees and has identified persons still available.

- * MPCA has summaries which detail amounts of waste from charitable groups, parks, public works, garbage, and commercial haulers.

- * Possible PRPs: 3M, Ford, Whirlpool, Railroad (bankruptcy is an issue), City of St. Paul, *Boonville*

- * MPCA has put together a rough list of 67 companies who were probably in business during the time the site was opened and possibly had hazardous waste brought to the site. Further investigation is needed on these companies before RFIs are issued.

\$10 million + 200,000 per year

Post-It™ brand fax transmittal memo 7671		# of pages 1
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Anita
from Jan

PIGS EYE DUMP

This application for an amendment to the Enforcement Cooperative Agreement requests a rebudget of Task 2 Pig's Eye Dump site money, requests an increase of \$35,808 in the Minnesota Pollution Control Agency (MPCA) budget for Task 1 PRP Search activities at the Pig's Eye Dump site, and requests budget/project period schedule extensions to September 30, 1995.

On September 26, 1991, MPCA was awarded an Enforcement CA to conduct a PRP search and investigation and to issue RFRAs to RPs. In 1991, there were some RFIs issued. Currently, MPCA has assigned a PRP search specialist to preform a PRP investigation. Unfortunately, because of staff time restraints and staff turnover, staff have been unable to work on the Dump site as needed. However, it is proposed to dedicate full time efforts on the Site in the future to complete PRP search activities by September 30, 1995.

The Pigs Eye Dump is located in the city limits of St. Paul, in Ramsey County, Minnesota. The ordinance permitting its operation was passed on July 11, 1956. The Dump was operated until July 1, 1972, when it was closed because the MPCA would not provide the City of St. Paul with an operating permit, as the Dump was located in a flood plain. The Dump encompasses 320 acres approximately. An expanded Site Inspection was performed by the MPCA during the summer of 1992. Soil sample results from the ash disposal area indicated elevated levels of metals, especially lead, silver, and mercury. Stream sediment samples from Battle Creek found elevated levels of zinc and arsenic, the presence of cholobenzene, phthalates, and pesticides chlordan and endrin. Elevated levels of cadmium and zinc were found in Pig's Eye Lake sediments. The Metropolitan Waste Control Commission (MWCC) performed soil borings in the southwest corner of the site during the spring of 1993. Barium and lead were found in elevated levels in these soils. The SSI report indicated that ground water samples contained elevated levels of arsenic, chromium, cyanide, lead, mercury, cobalt, and vanadium. Organic compounds found at temporary monitoring wells included methylene, chloride, naphthalene, dichlorobenzene, and aroclor.

The following is a summary of the tasks done to date.

Review of MPCA records was started in September, 1992. This information lead to possible sources of information and identified possible witnesses and RPs. This review also gave historical and technical information to proceed with the search.

Review of RFIs issued to date and the respective responses have also been done and follow up items have been identified.

City of St. Paul records were reviewed in October 1992. The records provided a legal description of the Dump, list of licensed haulers, copies of ordinances regarding the Dump,

correspondence regarding usage, maps, photographs, employees at the Site, consultants reports on waste disposal in the area, and types on wastes disposed monthly. Unfortunately, operating records have not been found yet, nor the billing and/or charge records. Attached is a brief summary of facts discovered during the investigation.

There has been some research done at the Minnesota Secretary of State's office to follow up on companies who have been identified as either haulers or direct users of the Dump.

A initial list of PRPs has been drafted, identifying businesses in operation during the time the Dump was opened.

Responses from other dump and landfill sites in the surrounding metropolitan area have been reviewed to determine possible PRPs.

A list of witnesses has been created, and one witness interview was done in November, 1992. This witness was able to provide names of other contacts and possible sources of information.

Two site visits were done and it is anticipated to do additional visits with former employees to determine locations of certain types of wastes.

Because of the size of the Dump and its wide usage in a large, metropolitan area by industrial entities, a proposed work plan is attached to complete the investigation in a timely and complete manner.

MPCA staff has identified problem areas in doing PRP investigations at other sites, and has prepared this work plan in light of those problems in order to avoid them.

- * In 1966, City of St. Paul is notified by the Minnesota Health Department on problems with the dump.
- * In 1967, City begins to charge fee for dump usage. MPCA notifies the City about problems with the site.
- * In 1957, 1965, 1969, and 1993, the site was under water as a result of flooding.
- * In 1971, 1,375 tons of waste dumped at the site per day. 25-30% demolition wastes and trees; 25% earth, concrete, and other noncombustibles; 10% cellulosic wastes like 3M; 2% City garbage; and 30% street waste, ashes, tin cans, and furniture.
- * In 1957, 1200 truckloads daily of industrial and commercial wastes.
- * Site was for haulers and city predominately. Individuals went to Fish Hatchery dump which was located nearby.
- * MPCA has lists of haulers who were licensed during the site years of operation.
- * MPCA has list of former dump employees and has identified persons still available.
- * MPCA has summaries which detail amounts of waste from charitable groups, parks, public works, garbage, and commercial haulers.
- * The City of St. Paul Police Department buried chemicals, explosives, and ammunition at the Site.
- * The following are the annual totals for yards paid for refuse at the Site. These amounts excluded charitable organizations, parks, public works, and garbage.

1967	832,899
1968	1,140,032
1969	1,300,407
1970	1,557,949
1971	1,662,388
1972	492,932

PROPOSED WORK PLAN TASKS

RECORDS COLLECTION

MPCA Records - To date, Solid Waste and Site Assessment records have been reviewed. Review of various St. Paul records in the general files should also be done. For information on particular PRPs, a review of the information in HWIMS (Hazardous Waste Information Management System) will be done.

City of St. Paul Records - Review of numerous City of St. Paul records has been completed. However, according to witnesses, maps, billing information, and operating reports should still exist somewhere. Staff will continue to contact the City and hopefully find these records. Staff will be contacting the Fire Department for information as there were fires on the site throughout the period of operation. The Police Department will also be contacted.

Ramsey County - Ramsey County has not been contacted to date on this site. Although the site was operated by the City, the County may have some information.

Hauler Records - Haulers have not been contacted to date. MPCA plans to contact the licensed haulers and request to review or be sent copies of their records before RFIs are issued. During the time the site was opened, hundreds of haulers were licensed by the City.

Courthouse Records - No research has been done at the Courthouse to date. MPCA is aware of one lawsuit involving the site and will check into this source.

HISTORICAL RESEARCH

Historical Society - No historical research has been done. Because this site was closed over 20 years ago and many witnesses are no longer available, it is important to determine what historical information is available. MPCA will be searching for historical information on the site (newspaper articles, photographs, maps) and information on businesses and industries during the relative time period (old phone books, manufacturing information).

Wilson Library - This is another good source for historical information.

Minnesota Department of Transportation & Army Corp of Engineers - These sources will be contacted for photographs and maps.

Title Search - A title search has not been done.

DATABASES

Volumetric, toxicity, and transactional databases have not been created. Guidance and/or training from EPA has been requested on these tasks.

WITNESS INTERVIEWS

A list of former employees has been found and persons available as of Fall, 1992 have been identified. One interview has been done to date. There are approximately six to eight former employees to interview. MPCA plans on interviewing haulers who have been identified as large industrial haulers and/or frequent users of the site. MPCA also has names of neighboring residents and parties who have called in the MPCA with information regarding the site. MPCA has information regarding a union for sanitary workers. The Union will be contacted regarding possible information it may have. Because of cost, MPCA staff will have the witnesses sign notarized statements, instead of formal depositions.

RFI ISSUANCE

RFIs will be issued in cycles. Industry specific questions will be written and supplemented with PRP specific questions based on HWIMS and other findings. There are potentially thousands of RFIs.

Because of problems encountered on other sites with witnesses being reluctant to speak and records being lost if RFIs or RFRAs are issued before gathers the information needed, MPCA staff proposes the tasks be completed in the following manner and time lines to alleviate any potential problems.

MPCA staff plan to do record collection and historical research concurrently with witness interviews. It is anticipated that witness may lead MPCA staff to additional information sources and records may lead staff to additional witnesses. Hopefully, staff will find operating records/billing records at the City offices.

A list of former dump employees has been found and staff plans to interview former employees currently available. At the same time, MPCA staff will be going through hauler lists. MPCA staff will interview haulers who have been identified as frequent users of the Site. The remaining haulers will be contacted via a questionnaire. Staff will ask questions regarding dump usage, customers, and types of waste collected.

It is anticipated that the above tasks will take approximately six to nine months.

Once records have been collected and witnesses have been interviewed and signed statements, RFIs will be issued. Staff will develop industry specific questions and supplement each with HWIMS information and other findings (witness statements and operating records).